

ORIGINAL

CLERK US DISTRICT COURT
NORTHERN DIST. OF TX
FILED

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

2019 JUN 25 PM 4:27

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UNITED STATES OF AMERICA

NO.

v.

3 - 19CR - 316 - B

RUBENHAY PINKHASOV

INFORMATION

The United States Attorney charges:

Count One

Conspiracy to Transport Stolen Money,
Securities, and Goods in Interstate Commerce
(Violation of 18 U.S.C. §§ 371 and 2314)

The Conspiracy and its Objects

1. Beginning in mid-October of 2015, and continuing through the beginning of December of 2015, in the Dallas Division of the Northern District of Texas and elsewhere, the defendant, **Rubenhay Pinkhasov** ("Pinkhasov"), did knowingly, combine, conspire, confederate, and agree with others to commit an offense against the United States, to wit: transportation of stolen goods, securities, and money having a value of \$5,000 or more, in interstate commerce, in violation of 18 U.S.C. § 2314.

Manner and Means of the Conspiracy

The manner and means by which **Pinkhasov** and his coconspirators sought to accomplish the purpose of the conspiracy included, among others, the following:

2. The conspirators would and did transfer and fence stolen jewelry and diamonds across state lines.

3. The conspirators would and did deal in cash in order to avoid creating a paper trail.

4. The conspirators would and did use facilities engaged in interstate commerce, including commercial carriers, telephones, the internet, and federally insured banks, to further the objective of the conspiracy.

Overt Acts

In furtherance of the conspiracy, and to accomplish its objects and purpose, at least one of the coconspirators committed and caused to be committed in the Northern District of Texas, Dallas Division, and elsewhere, at least one of the following overt acts, among others:

5. One coconspirator purchased a bus ticket in the Dallas Division of the Northern District of Texas, to plan the commission of the robbery.

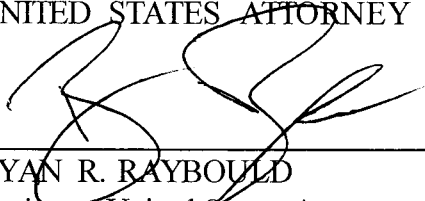
6. From mid-October of 2015, continuing through the beginning of December of 2015, the coconspirators, including **Pinkhasov**, met in Miami, Florida, to negotiate a price for the stolen diamonds and jewelry.

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7. From mid-October of 2015, continuing through the beginning of December of 2015, **Pinkhasov** and the coconspirators caused diamonds and jewelry to move across state lines, including from Texas to Florida to New York.

In violation of 18 U.S.C. §§ 371 and 2314.

ERIN NEALY COX
UNITED STATES ATTORNEY



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